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*Counsel for Plaintiffs
Signify North America Corporation
and Signify Holding B.V.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SIGNIFY NORTH AMERICA CORPORATION and
SIGNIFY HOLDING B.V.

Case 2:22-cv-02095-JAD-EIY

**JOINT STIPULATION AND
ORDER TO EXTEND
DEADLINES IN REVISED
SCHEDULING ORDER**

(Fourth Requested Extension)

Plaintiffs,

Plaintiffs,

V.

LEPRO INNOVATION INC,
LE INNOVATION INC,
INNOVATION RULES INC.,
HOME EVER INC., and
LETIANLIGHTING INC.,

Defendants

1 This is a patent-infringement suit over LED lighting products. Plaintiffs Signify North
 2 America Corporation and Signify Holding B.V. (collectively, “Plaintiffs”) allege that Defendants
 3 Lepro Innovation Inc., LE Innovation Inc., Innovation Rules Inc., Home Ever Inc., and
 4 Letianlighting Inc. (collectively, “Defendants”) infringed seven of Signify’s patents covering
 5 various LED technologies.

6 The parties have been working diligently and cooperatively to meet the Court’s deadlines.
 7 Over the past several months, the parties have engaged in meaningful settlement discussions in an
 8 attempt to resolve this case. To continue those discussions, the parties have agreed and stipulated
 9 to a brief extension of thirty (30) days of the upcoming expert discovery deadlines. The parties
 10 respectfully submit that this brief extension will conserve the resources of the parties and the Court
 11 and will allow the parties to focus on attempting to reach a resolution to this matter.

12 Accordingly, the parties respectfully seek the Court’s permission to further extend the
 13 following case deadlines in the operative scheduling order (ECF No. 122)¹:

<u>Event</u>	<u>Current Date</u>	<u>New Agreed Date</u>
Expert Designations	June 17, 2024	July 17, 2024
Rebuttal Expert Designations	July 17, 2024	August 19, 2024
Expert Discovery Cut-off	August 19, 2024	September 18, 2024
Dispositive Motion Deadline	September 18, 2024	October 18, 2024

20 The parties respectfully submit that good cause exists to extend these deadlines for the
 21 reasons set forth herein. Pursuant to Local Rule 26-3, the following information is provided:

22 (a) **A statement specifying the discovery completed.**

23 The parties have served and responded to written discovery.

26 ¹ On December 21, 2023, the parties filed a joint stipulation and order to extend certain discovery deadlines
 27 (ECF No. 100), which was granted on December 28, 2023 (ECF No. 103). On February 1, 2024, the parties filed a
 28 joint stipulation and order to extend certain discovery deadlines (ECF No. 119), which was granted on February 2,
 2024 (ECF No. 120). On April 23, 2024, the parties filed a joint stipulation and order to extend certain discovery
 deadlines (ECF No. 121), which was granted on February 2, 2024 (ECF No. 122).

1 On March 20, 2023, Plaintiffs served a first set of interrogatories and a first set of
2 documents requests.

3 On April 3, 2023, the parties served Rule 26(a) initial disclosures.

4 On April 26, 2023, Defendants served responses to Plaintiffs' first set of interrogatories
5 and first set of documents requests.

6 On May 26, 2023, Defendants served a first set of interrogatories and a first set of
7 documents requests.

8 On June 26, 2023, Plaintiffs served responses to Defendants first set of interrogatories and
9 first set of documents requests.

10 On October 27, 2023, Plaintiffs served a second set of documents requests.

11 On November 15, 2023, Plaintiffs served a third set of documents requests.

12 On November 27, 2023, Defendants served responses to Plaintiffs' second set of
13 documents requests.

14 On December 15, 2023, Defendants served responses to Plaintiffs' third set of documents
15 requests.

16 || On December 15, 2023, Plaintiffs served a second set of interrogatories.

17 On January 15, 2024, Defendants served responses to Plaintiffs' second set of
18 interrogatories.

19 The parties have produced documents in response to each other's document requests. To
20 date, Plaintiffs have produced 92,659 pages of documents, Defendant LEPRO Innovation Inc. has
21 produced 1,550 pages of documents, Defendant LE Innovation Inc has produced 14 pages of
22 documents, Defendant Innovation Rules Inc. has produced 44,821 pages of documents, Defendant
23 Home Ever Inc. has produced 473 pages of documents, Defendant Letianlighting, Inc. has
24 produced 31,399 pages of documents, and Defendants have collectively produced an additional
25 8,535 pages of documents.

26 A deposition of Signify's technical expert, Dr. Regan Zane, was completed on August 25,
27 2023, in connection with the parties' claim construction briefing.

1 Defendants conducted depositions of four named inventors of the Patents-in-suit, Matthias
2 Wendt and Reinhold Elferich, on January 7 and 9, 2024, Martijn Lankhorst and Patrick Van
3 Kooten, on February 7 and 9, 2024. The witnesses and Plaintiffs' counsel for these depositions
4 were in Eindhoven, The Netherlands.

5 In addition, the following depositions of Defendants' witnesses were conducted by
6 Plaintiffs on January 15-25, 2024:

- 7 1) Rule 30(b)(6) deposition of Defendant LEPRO Innovation Inc.
- 8 2) Rule 30(b)(6) deposition of Defendant LE Innovation Inc.
- 9 3) Rule 30(b)(6) deposition of Defendant Innovation Rules Inc.
- 10 4) Rule 30(b)(6) deposition of Defendant Home Ever Inc.
- 11 5) Rule 30(b)(6) deposition of Defendant Letianlighting, Inc.
- 12 6) Individual deposition of Weiqiao Xun
- 13 7) Individual deposition of Litao Xu
- 14 8) Individual deposition of Ji Wu

15 Furthermore, the following depositions of Plaintiffs were conducted by Defendants on
16 April 17 and 18, 2024:

- 17 1) Rule 30(b)(6) deposition of Plaintiff Signify North America Corporation
- 18 2) Rule 30(b)(6) deposition of Signify Holding B.V.

19 Finally, the following depositions of Defendants' witnesses were conducted by Plaintiffs
20 on April 23-24 and May 7-8, 2024:

- 21 1) Individual deposition of Zhikang Huang
- 22 2) Individual deposition of Tianying Li

23 **(b) A specific description of the discovery that remains to be completed.**

24 Expert discovery remains to be completed (*i.e.*, initial expert reports, rebuttal expert
25 reports, and expert depositions).

1 (c) **The reasons why the deadline was not satisfied or the remaining discovery was not**
 2 **completed within the time limits set by the discovery plan.**

3 All previous case deadlines have been met. The parties have been working diligently and
 4 cooperatively to meet the upcoming expert discovery deadlines. The parties respectfully seek an
 5 extension of thirty (30) days of expert discovery deadlines to continue settlement discussions.

6 (d) **A proposed schedule for completing all remaining discovery.**

7 The parties jointly proposed the following schedule for completing remaining discovery:

<u>Event</u>	<u>Current Date</u>	<u>New Agreed Date</u>
Expert Designations	June 17, 2024	July 17, 2024
Rebuttal Expert Designations	July 17, 2024	August 19, 2024
Expert Discovery Cut-off	August 19, 2024	September 18, 2024
Dispositive Motion Deadline	September 18, 2024	October 18, 2024

14 (e) **Good Cause Exists for Extending the Subject Deadlines Above.**

15 Good cause exists for the requested relief. As noted above, the parties have engaged in
 16 meaningful settlement discussions over the past several months in an attempt to resolve this case.
 17 To continue those discussions, the parties have agreed and stipulated to a brief extension of thirty
 18 (30) days of the remaining case deadlines. The parties respectfully submit that this brief extension
 19 will conserve the resources of the parties and the Court and will allow the parties to focus on
 20 attempting to reach a resolution to this matter.

21 For these reasons, the parties respectfully submit that good cause exists to extend these
 22 deadlines. No other case deadlines are affected by the requested extension.

23 WHEREFORE, the parties hereby respectfully request that the Court enter an order
 24 extending the deadlines as set forth above.

1 Dated: June 11, 2024

2 Respectfully submitted,

3 /s/ F. Christopher Austin

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18 COUNSEL FOR PLAINTIFFS Signify
19 North America Corporation and Signify
Holding B.V.

22 IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: June 11, 2024

Respectfully submitted,

/s/ Hua Chen (with permission)

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